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January 4, 2002

Ms. Alice Kang
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Rhode Island Political Action Committee, Inc. (C00307991)

Dear Ms. Kang:

This response is submitted on behalf of Rhode Island Political Action Committee, Inc. ("RIPAC") to answer questions raised by the Federal Election Commission's ("FEC" or the "Commission") notification, dated December 5, 2001, concerning information reported on the February Monthly Report covering the period January 1, 2001 through January 31, 2001. An itemization of the Committee's response to the FEC's question follows:

1. Transfers from Non-Federal Account to Federal Account for Joint Activity

RIPAC's Detailed Summary Page, Line 18 Column A, for the February 2001 Monthly Report disclosed \$22,556.69 in transfers within the reporting period from the non-federal account for joint activity. On Line 21(a)(ii) Column A, RIPAC disclosed \$2,317.94 as the non-federal share of expenses incurred for joint activity during the reporting period. You questioned why the amount transferred within the reporting period did not equal the non-federal share of expenses incurred during the reporting period for joint activity.

Pursuant to 11 C.F.R. §106.5(g)(2)(ii)(B), a committee may transfer funds from its non-federal account to its federal account not more than 10 days before or more than 60 days after the payments for which they are designated are made. A committee is not required to make the non-federal to federal account transfers within a monthly reporting period for all joint activity expenditures made in that period. Pursuant to FEC regulations, the non-federal to federal account transfers in any one-month reporting period may properly be designated for expenditures that were actually made in a prior period or for expenditures that will be made in the subsequent reporting period. Accordingly, when the amount transferred from a committee's non-federal account does not equal the amount reported for joint activity in a one-month reporting period it does not necessarily mean that there is a discrepancy on the committee's report.

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